

ICC Docket No. 01-0662
Ameritech Illinois Ex. 4.1 (Cottrell)
Schedule – 2/Part 4
CONFIDENTIAL

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,)	
to consider Ameritech Michigan's compliance)	
with the competitive checklist in Section 271 of)	Case No. U-12320
the federal Telecommunications Act of 1996.)	
_____)	

**SBC AMERITECH MICHIGAN’S REPLY TO WORLDCOM’S AND Z-TEL’S
JANUARY 24, 2002 COMMENTS ON LINE LOSS NOTIFICATION**

Michigan Bell Telephone Company, d/b/a SBC Ameritech Michigan (hereinafter “SBC”), submits the following reply to the January 24, 2002 Responses of MCImetro Access Transmission Services, Inc., Brooks Fiber Communications of Michigan, Inc., and MCI WorldCom Communications, Inc., (hereinafter individually or collectively referred to as “WorldCom”) and Z-Tel on SBC’s January 9, 2002 Interim Report on the Line Loss Notification.

I. GENERAL REPLY

Both WorldCom and Z-Tel in their comments state, or imply, that SBC is not treating the issue of line loss notifiers seriously and is not acting responsibly. This is simply not true. SBC takes its commitments regarding line loss notifiers very seriously and has dedicated a significant amount of resources to identify and address all issues surrounding the accuracy and timeliness of the generation of line loss notifications when SBC provides all the facilities used by CLECs in their provision of basic local exchange service to end users. SBC has dedicated additional resources to the cross-functional team. As previously noted, this cross functional team has the

responsibility to identify the potential causes of missing or inaccurate line loss notifiers, and to define and implement appropriate solutions (whether system, process or procedure) so that this issue is corrected as completely and expeditiously as reasonably possible. As represented in its previous filings with this Commission, SBC will continue to update the Commission with its progress on a regular basis, until this issue has been resolved to the Commission's satisfaction. SBC's next line loss update will be provided no later than February 28, 2002.

II. REPLY TO WORLDCOM

WorldCom, in its filing, concluded that the problem with regard to SBC's Line Loss Notifications was not yet resolved and was unlikely to be resolved by February 8, 2002. However, SBC, in its January 29, 2002 Supplemental Report on Line Loss Notifications stated that it will continue to provide updated information to the Commission and the CLECs on this issue *until all identified problems have been addressed*. SBC also committed to provide its next update by February 28, 2002. SBC diligently continues to investigate this issue, identify and implement fixes as necessary, and is working to reconcile records and provide all appropriate loss notifications to CLECs. SBC understands the need for timely line loss notifications and is committed to providing these in a timely manner.

WorldCom cited specific discrepancies in the data it actually received from SBC, which will be addressed on a case-by-case basis:

A. Variance in reported recovery for Michigan

WorldCom claims that the 500 line loss notifiers that were indicated as having been sent to it for the “CLEC to CLEC Migration” scenario is inaccurate; rather, the number should be 464 pursuant to a spreadsheet WorldCom received from SBC on December 21, 2001. However, SBC notes that the 500 line loss notifiers referenced were transmitted to WorldCom in November. SBC is unclear as to where the 464 number derives from and requires further dialogue with WorldCom. Thus, SBC will work with WorldCom on its regular calls regarding line loss notifiers to resolve this issue.

For winbacks, the SBC report states that 11,504 had been recovered as of January 9, 2002 and SBC sent WorldCom a spreadsheet with 11,504 recovered transactions. Although WorldCom claims to have received 12,338, SBC can confirm via General Electric Information System – Value Added Network (GEIS VAN) logs and interchange control numbers¹ that 11,504 transactions were sent to WorldCom, which left 4,163 to be sent as of January 9, 2002. Of these 4,163 remaining line loss notifiers, 4,108 were sent during the January 28 through February 3, 2002 timeframe. The remaining line loss notifiers are still being investigated and will be discussed with WorldCom as part of the weekly status conference calls currently being held.

¹ Electronic Data Interchanger (EDI) is a data transmission facility. An interchange is essentially a batch of transactions transmitted to a CLEC. The control number assigned to each interchange allows SBC’s systems to track when the batch is sent and what it contains. The GEIS VAN log is used to track all interchanges and activity that took place.

B. WorldCom's 289 recovery transactions still allegedly missing

WorldCom claims that on January 10, 2002, it notified Ameritech that the spreadsheet WorldCom received had 289 extra entries that were not reflected in the data that SBC had sent electronically. WorldCom further claims that as of January 24, 2002 (the date it filed its comments) it still had not received the missing transactions. However, in reality, SBC reflowed 284 of the line loss transactions in question to WorldCom during the period of January 16, 2002 through January 18, 2002. SBC is in the process of verifying the delivery to WorldCom during this period by obtaining the GEIS VAN logs with the interchange control numbers and the total number of line loss transactions that were sent.

Thus, 284 of the 289 loss notifications referenced by WorldCom were electronically flowed to WorldCom on more than one occasion. As of February 8, 3 loss transactions remain to be sent and 2 cannot be identified. SBC will continue to work with Worldcom during the weekly status conference calls to reach resolution.

C. The January 22, 2002 file allegedly contains duplicate transactions

WorldCom claims that on January 22, 2002, SBC sent a line loss file with 12,479 line loss transactions. WorldCom further alleges that "around" 10,000 of these were originally sent as recovery on December 15, 2001. In fact, SBC verified the number of transactions sent to WorldCom on January 22, 2002 by obtaining the GEIS VAN log with the interchange control numbers and the total number of line loss transactions that were sent in each interchange. The

total for the entire day for WorldCom was 1,272. There is no record of a duplicate recovery file sent.

D. WorldCom has received rejects on accounts for “Account handled by another reseller” or “Account is disconnected”

WorldCom claims that it received 2,360 rejects in December 2001 for Michigan accounts where WorldCom should have received line loss notifications. As of January 22, 2002, of the 2,360, WorldCom states that it had still not received loss notifications for 1,829 (or 77.5%). WorldCom notes that some of these rejects could be the result of loss notifications that SBC still “owes” to WorldCom.

This type of reject situation can occur for numerous reasons and in unique circumstances. In order to address properly all concerns, SBC is in the process of investigating these rejects on a case-by-case basis. WorldCom account managers will set up a weekly meeting to address line loss notifications and work through all issues to both parties’ satisfaction. Because these types of issues necessarily require individual attention on a case-by-case basis, they are best handled in an informal “business to business” setting where all the appropriate players, including the necessary technical subject matter experts from both companies, can provide the appropriate data and responses to the questions. This will allow the parties to determine what is occurring and then to resolve any identified issues.

Additionally, questions arise that must be investigated, such as: Why is WorldCom’s systems not receiving EDI 836 transactions (line loss notifications) in the same number as the GEIS VAN logs indicate? Why is WorldCom receiving rejects for accounts it has not received loss notifications for? These questions can only be resolved through intensive manual and

electronic investigations, which require subject matter experts from both companies. The account management teams must work directly with CLECs and resolve these types of specific issues to all parties' satisfaction. However, SBC recognizes the seriousness of missing line loss notifications and that, at a high level, this forum of reporting the status is the proper forum to inform and update the Commission of the progress made. To this end, SBC is dedicated to addressing all line loss notification issues raised to work toward providing all appropriate line loss notifications in a timely manner.

E. WorldCom wants SBC to issue an Accessible Letter on Line Loss Notification

WorldCom claims that whenever SBC becomes aware of an issue, such as missing line loss notifications, it is supposed to issue an Accessible Letter detailing the problem and outlining how SBC intends to address the problem. SBC has not issued an Accessible Letter in this case because, as noted in SBC's January 29, 2002 Report, all affected CLECs were notified directly of the missing line loss notifications by each assigned account manager. In fact, Attachment A to SBC's January 29, 2002 Report listed the date of notification and delivery method to each affected CLEC. Attachment B to the same filing contained a typical letter that was used to notify the affected CLECs. Each letter was accompanied with a letter the CLEC could use with its end users to explain that any double billing encountered was due to SBC not properly generating the line loss notifiers.² Thus, SBC has not failed to provide notice to CLECs.

² This end user letter was also provided as Attachment B to SBC's January 9, 2002 Interim Report.

Furthermore, SBC has already outlined the steps it has taken to address this issue. SBC has provided retraining to all service representatives that are responsible for activity dealing with possible line loss notifications – activity like CLEC-to-CLEC migrations and winbacks. In addition, SBC formed a cross-functional team to review the overall line loss notification process for CLECs using SBC’s facilities to provide service to their end users. SBC’s January 29, 2002 Supplemental Report stated that this cross-functional team identified the additional potential scenarios for causing the missing line loss notifiers. SBC takes this matter very seriously and has committed the resources required to identify all root causes and outline any corrective action that needs to be taken. Moreover, SBC will continue to provide updated information to this Commission and to all affected CLECs on all issues until all identified problems have been addressed. The next update, as mentioned above, will be provided no later than February 28, 2002. As appropriate per the Change Management Process (CMP) guidelines for any resolutions implemented, an accessible letter will be sent.

III. REPLY TO Z-TEL

In its January 24, 2002 filing, Z-Tel claimed that it first notified SBC eight months ago of two problems with line loss notifications that still continue today. As reported in the January 9, 2002 Interim Report, SBC did work with Z-Tel by providing a manual (fax) list of identified missing line loss notifiers based on data available at the time. Z-Tel also notes that it receives line loss reports designated with “N” (new connect) orders as well as “D” (disconnect) orders. As SBC reported in its January 29, 2002 Supplemental Report, the cross functional team identified this problem in its “Issue 7” version of its EDI system. The system was using the order number of the first of the related service orders used to change the end user’s local carrier

in the line loss notification. In some instances, the “D” or “Disconnect” Order was not the order number used. However, the telephone numbers provided in the line loss notifiers were correct and could be used by the CLEC.

Since late November 2001, Z-Tel has been in contact with its account management team on a regular basis regarding line loss notification problems. SBC’s account management team for Z-Tel has provided Z-Tel with related D (Disconnect) order numbers associated with the N (New) order numbers that had originally been sent on the line loss notifiers; Z-Tel had provided a list of N order numbers on January 21, 2002. In its January 29, 2002 Supplemental Report, SBC had indicated that it would not be implementing any changes to “Issue 7” to correct this identified problem due to this version of its EDI systems being replaced, and no longer available to CLECs, as of March 9, 2002. However, in subsequent review, SBC determined it was appropriate to implement a system update (Identified Problem or “IP” 52233) on February 9, 2002, which will correct this problem by providing the correct order number for the Issue 7 EDI 836 transactions as it was found it could be accomplished without expending undue resources given its short remaining life.

Z-Tel did report a problem with not receiving line loss notifiers in May, 2001 and a fix was implemented in June, 2001 correcting the information in Z-Tel’s customer transaction preference table to match the location table in MOR/Tel, which is also referenced as the Customer Profile. This issue reflects the situation identified as a potential cause of missing line loss notifiers in SBC’s January 29 Supplemental Report (see pp. 4-5). As indicated, SBC has committed to undertaking an audit of the information contained in the MOR/Tel customer profile to ensure it is accurate pursuant to the information supplied by each CLEC on its questionnaire.

Z-Tel has also informed SBC account management that more line loss notifiers are missing. Both Z-Tel and SBC are diligently working to investigate and resolve these issues. As discussed above in response to WorldCom, this type of issue is best resolved by regular “business to business” contact between each company’s subject matter experts. SBC continues to work with Z-Tel on a regular, detailed basis to investigate all incidents of missing line loss notifiers or line loss notifiers that require additional investigation. SBC is also committed to working with Z-Tel to provide a complete reconciliation of all Z-Tel’s current customer base.

Z-Tel implies that SBC provides no documentation or information on line loss notifications to CLECs. However, the Local EXchange User Guide (LEX) provides an explanation of line loss notification and how to view, manage, delete, and print line loss notifications in LEX. These instructions are provided as Confidential Attachment A to this filing. In addition, SBC provided reference information regarding line loss notifications to Z-Tel as recently as January 31, 2002.

Finally, Z-Tel complains that loss notifications are not provided in a timely manner. What Z-Tel may not be familiar with is that the Michigan Commission has adopted a performance measurement – MI 13, which was agreed to by the performance measurement collaborative, that measures the timeliness of line loss notifications. The business rules for MI 13 state a benchmark of line loss notification to CLECs within one hour of service order completion 95% of the time. At this time, this performance measurement is for diagnostic purposes and will be tracked and reported for all SBC Ameritech states.

IV. REPLY REGARDING END USER NOTIFICATION

Both WorldCom and Z-Tel raise issues regarding the end user notification that was required by the Commission's December 20, 2001 Order in this proceeding. Preliminarily, SBC has delayed its planned distribution of the bill page message referenced in its January 9 Interim Report pursuant to a request received from the Commission Staff. SBC acknowledges that it would be beneficial to work with the Commission Staff and the interested CLECs to address any concerns related to end user notification.

V. CONCLUSION

In conclusion, SBC reiterates that it fully recognizes the importance of accurate and timely line loss notification. SBC is currently dedicating all necessary resources to address this issue. SBC renews its commitment to provide updated information to the Commission and to the affected CLECs on its continuing efforts to completely resolve any identified problems with line loss notifications.

Respectfully Submitted,

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**CLEC SPECIFIC LINE LOSS INFORMATION IS PROPRIETARY
AND ONLY AVAILABLE IN THE
CONFIDENTIAL VERSION OF THIS SCHEDULE**